

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: Guy D. LaBar : Case No. 5:17-bk-04889-RNO
aka Guy Dean LaBar : Chapter 13
aka Guy LaBar :
Karla Jan LaBar :
aka Karla J. LaBar :
aka Karla LaBar :
Debtor. :
:

JP Morgan Chase Bank, N.A., :
Movant, : Motion for
v. : Relief from Stay
:
Guy D. LaBar :
aka Guy Dean LaBar :
aka Guy LaBar :
Karla Jan LaBar :
aka Karla J. LaBar :
aka Karla LaBar :
:
Charles J. DeHart, III, Trustee, :
Respondents. :
:

**ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY OF PROPERTY
KNOWN AS A 2017 MAZDA MAZDA3 VIN#3MZBN1U75HM120129**

AND NOW COME Debtors by and through their attorneys, Newman, Williams, P.C. and in
Answer to the Motion of JP Morgan Chase Bank, N.A for Relief from Stay avers:

1. Admitted.
2. Denied. After reasonable investigation the Debtor is without knowledge sufficient to form a
belief as to the truth of this averment and therefore the averment is denied.
3. Admitted.
4. Admitted.
5. Denied. After reasonable investigation the Debtor is without knowledge sufficient to form a
belief as to the truth of this averment and therefore the averment is denied. By way of

further answer, the assignment demonstrating Movant is a real party-in-interest is not attached to the Motion for Relief from Stay.

6. Denied. Debtors claimed an exemption in the amount of \$1.00 in accordance with 11 U.S.C. § 522(d)(5).
7. Admitted.
8. Denied. Debtor reasonably believes the amount due is less.
9. Denied. Debtor reasonably believes the amount due is less.
10. Denied to the extent the averments of paragraph 10 are anything other than a statement or conclusion of law or request for relief that does not require a response.
11. Admitted.
12. Denied to the extent the averments of paragraph 12 are anything other than a statement or conclusion of law or request for relief that does not require a response.
13. Denied to the extent the averments of paragraph 13 are anything other than a statement or conclusion of law or request for relief that does not require a response.

WHEREFORE, Debtors respectfully pray this Honorable Court for an Order that the Motion of JP Morgan Chase Bank, N.A for Relief from Stay be denied and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

By: Robert J. Kidwell, Esquire
 Attorneys for Debtor
 PO Box 511, 712 Monroe Street
 Stroudsburg, PA 18360
 (570) 421-9090; fax (570) 424-9739
 rkidwell@newmanwilliams.com